

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

J. ENDRES	:	Case No. 5:17-cv-2408
	:	
Plaintiff	:	JUDGE SARA LIOI
	:	
v.	:	
	:	
NORTHEAST OHIO	:	
MEDICAL UNIVERSITY, et al	:	
	:	
Defendants	:	

**MOTION FOR LEAVE TO WITHDRAW AND SUBSTITUTE COUNSEL**

For the reasons set forth below, and pursuant to Local Rule 83.9, Plaintiff respectfully requests that the Court enter an order allowing the withdrawal as counsel for Plaintiff the firm of Nesenoff and Miltenberg, and undersigned counsel Andrew T. Miltenberg and Diana R. Warshow, along with their local counsel J. Michael Murray, and substitute as counsel for Plaintiff the law firm of Marshall and Forman of Columbus Ohio and attorneys John S. Marshall and Edward R. Forman, with John S. Marshall as lead counsel for Plaintiff.

**MEMORANDUM IN SUPPORT OF MOTION**

Plaintiff Julian Endres has ended the attorney client relationship with present counsel, the firm of Nesenoff and Miltenberg, and undersigned counsel Andrew T. Miltenberg and Diana R. Warshow, along with their local counsel J. Michael Murray and has retained the firm of Marshall and Forman, with John S. Marshall and Edward Forman to represent him in the above captioned matter. Mr. Endres has asked that we file this Motion seeking the substitution of the firm of Marshall and Forman of Columbus, Ohio and attorneys John S. Marshall, Edward R. Forman with John S. Marshall to act as lead counsel. Mr. Marshall and Mr. Forman are admitted to

practice before the Northern District of Ohio. Because this request comes directly from the Plaintiff Mr. Endres, he is aware of (and has been sent a copy of this motion).

For these reasons, Plaintiff respectfully requests that the Court enter an order allowing undersigned and their local counsel to withdraw, and substituting Marshall and Forman, John S. Marshall and Edward R. Forman as counsel for Plaintiff. Upon the granting of this motion, substitute counsel will promptly file their entry of appearance.

Respectfully submitted,

By: /s/ Andrew T. Miltenberg  
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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing was filed with the Court on this 14<sup>th</sup> day of February, 2018, using the CM/ECF system, which will send notification of such filing to all counsel of record. Parties may access this filing through the court's filing system.

/s/ J. Michael Murray  
J. MICHAEL MURRAY